

Below is an order of the court.



DAVID W. HERCHER
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

EDWARD A. ARINIELLO, JR.,

Debtor.

Case No. 21-31142-dwh11

Chapter 11

STIPULATED ORDER EXTENDING DEADLINE TO
OBJECT TO DEBTOR'S HOMESTEAD EXEMPTION

Debtor-in-Possession Edward A. Ariniello, Jr. (the "**Debtor**") and creditors Solomon Management, Inc. and Robert D. Solomon, in his capacity as Trustee of the Mervin Solomon GST Trust UW 9-28-2008 (collectively, the "**Solomon Entities**") hereby stipulate as follows:

1. The deadline to object to the Debtor's claimed homestead exemption in this chapter 11 bankruptcy proceeding was originally set for July 14, 2021.

2. On June 28, 2021, the Debtor filed his Motion to Extend the Deadline to Object to Debtor's Homestead Exemption (Dkt. No. 25, the "**Motion to Extend**"), in which the Debtor requested that the time to objection to the Debtor's claimed homestead exemption "be extended to coincide with the yet-to-be-scheduled deadline for creditors to file objections to the Debtor's Plan of Reorganization." Motion to Extend ¶ 6. The Motion to Extend was granted pursuant to a text-only order on June 30, 2021. See Dkt. No. 26.

3. On August 17, 2021, the Debtor filed his Plan of Reorganization Dated August 17, 2021 (Dkt. No. 30, the "**Plan**"). On August 20, 2021, the Court entered its Order Fixing Time for Filing Acceptances or Rejections of Plan; and Notice of Confirmation Hearing (Dkt. No. 31, the "**Scheduling Order**"), in which it set the date and time of the confirmation hearing, along with several deadlines that are computed from the confirmation hearing date. These deadlines include the deadline for objecting to the confirmation of the Plan.

4. Under the Court's Scheduling Order, the current deadline for objections to confirmation of the Plan is September 24, 2021. Because the Court has granted the Motion to Extend, the deadline for objections to the Debtor's claimed homestead exemption is September 24, 2021 as well.

5. On September 16, 2021, the Debtor and the Solomon Entities participated in a mediation. The Debtor and the Solomon Entities intend to participate in a continued mediation in October 2021. Thus, the Debtor and the Solomon Entities intend to ask the Court to continue the Plan confirmation hearing to a date in November 2021 and reschedule the related deadlines, including the confirmation objection deadline, accordingly.

6. It is in the best interests of the Debtor, the creditors, and the estate to alleviate the need for filing objections to the Debtor's claimed homestead exemption while the Debtor and the Solomon Entities continue to engage in settlement negotiations and participate in mediation. In order to provide sufficient time for the Debtor and the Solomon Entities to

conclude their negotiations, and file and respond to objections to the Debtor's claimed homestead exemption, if necessary, the Debtor and the Solomon Entities agree that the deadline to object to the Debtor's claim homestead exemption should be further extended and that cause exists for that extension.

7. The Debtor and the Solomon Entities hereby stipulate that the deadline to file and serve objections to the Debtor's claimed homestead exemption is extended to the later of (a) the deadline for objecting to confirmation of the Plan, as may be rescheduled by this Court from time to time, and (b) October 25, 2021.

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IT IS SO STIPULATED:

Dated September 20, 2021

Dated September 20, 2021

MILLER NASH LLP

MOTSCHENBACHER & BLATTNER LLP

/s/ Garrett S. Ledgerwood

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Management, Inc. and Robert D. Solomon,
in his capacity as Trustee of the Mervin
Solomon GST Trust UW 9-28-2008

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Attorneys for Debtor-in-Possession
Edward A. Ariniello, Jr.

RULE 9021-1(a) CERTIFICATION: I certify I have complied with LRB 9021-1(a) because the proponents seek entry of this order without notice and a hearing pursuant to LBR 9013-1(b)(2)(F).

/s/ Garrett S. Ledgerwood

Garrett S. Ledgerwood, OSB No. 143701